

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Television Systems)	MB Dkt. No. 87-268
and Their Impact upon the)	
Existing Television Broadcast)	
Service)	

To: Office of the Secretary

COMMENTS OF ALABAMA EDUCATIONAL TELEVISION COMMISSION

Alabama Educational Television Commission (“AETC”), by its attorneys and pursuant to the Commission’s Rules, comments on the above-referenced rulemaking proceeding to amend the DTV Table of Allotments in Section 73.622 of the Rules. AETC is the licensee of noncommercial educational television station WCIQ(TV/DT), Mount Cheaha, Alabama.

As detailed in the attached Engineering Technical Statement of Kessler and Gehman Associates, Inc., AETC respectfully requests two revisions to the station’s Proposed DTV Table of Allotments Information in Appendix B of the *Seventh Further Notice of Proposed Rulemaking*, FCC 06-150, MB Docket No. 87-268 (Oct. 20, 2006) – an increase in maximum effective radiated power from 19 kW to 21 kW, and specification of a non-directional antenna. As the attached technical statement shows, the currently proposed DTV facility contour for WCIQ would fall short of replicating the licensed WCIQ analog coverage, resulting in a minimum Grade B service population loss of 123,283 persons – a 4.6% reduction to the current WCIQ analog population. In addition, as explained in the attached statement, AETC submits that a non-directional antenna pattern, such as that currently licensed for both WCIQ’s analog

and digital facilities, is required for WCIQ's DTV allotment. Accordingly, for the reasons provided in the attached statement, AETC submits that the public interest would be well served by revising the proposed DTV Table information for WCIQ to change the effective radiated power to 21 kW, and the antenna azimuth pattern to non-directional. These revisions would best serve the goals of replicating WCIQ's current analog service contours, conforming the Table to the station's existing facilities, and preventing the post-transition loss of the station's service to more than one hundred thousand viewers.

Respectfully submitted,

ALABAMA EDUCATIONAL TELEVISION
COMMISSION

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January 25, 2007

**ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY, JR.
OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC., TELECOMMUNICATIONS
CONSULTING ENGINEERS IN CONNECTION WITH THE SEVENTH FURTHER
NOTICE OF PROPOSED RULE MAKING REGARDING THE PARAMETERS ASSIGNED
IN THE PROPOSED DTV TABLE OF ALLOTMENTS FOR THE ALABAMA
EDUCATIONAL TELEVISION COMMISSION POST-TRANSITION DIGITAL TELEVISION
BROADCAST FACILITY, WCIQ-DT CHANNEL *7, MOUNT CHEAHA, ALABAMA.**

The firm Kessler and Gehman Associates, Inc. was retained by the Alabama Educational Television Commission (AETC), Birmingham, Alabama to review the WCIQ-DT Channel *7 post-transition facility's technical parameters assigned in the FCC's proposed DTV Table of Allotments (TOA) contained in the Seventh Further Notice of Proposed Rule Making (7th FNPRM) and to prepare comments for filing if detailed engineering studies reveal inaccuracies with respect to the proposed technical parameters.

Discussion

AETC is licensed to operate the WCIQ-TV Channel *7 analog facility with a maximum effective radiated power (ERP) of 316 kW with an antenna height radiation center of 610 meters above average terrain (AAT) using a GE model TY-28H nondirectional antenna (BLET-405). AETC is also licensed to operate the WCIQ-DT Channel *56 out-of-core facility with a maximum ERP of 61 kW with an antenna height radiation center of 561.6 meters AAT using a Dielectric model TLP-24A nondirectional antenna (BLEDT-20061108AAN).

Each DTV channel allotment was chosen by the FCC to best match the Grade B contour of the NTSC station with which it was paired. From the beginning, AETC's plan for WCIQ with respect to the post-transition digital facility was to operate with full "NTSC" replication facilities. Accordingly, AETC elected "replication" in its Pre-Election Certification application based on its NTSC coverage.

The FCC released the 7th FNPRM on October 20, 2006 which included the proposed DTV Table of Allotments. In the 7th FNPRM, it states that interested parties may file comments on or before January 11, 2007 (now extended to January 25th) with respect to the proposed DTV Table and asks that licensees review the accuracy of their information contained in the proposed DTV Table, including comments on any inaccuracies or discrepancies. The FCC also stated in the 7th FNPRM that it believes that its proposed new DTV Table is the result of informed decisions by licensees when making their channel elections and that licensees benefited from the clarity and transparency of the channel election process. However, the clarity of the Channel Election process is in doubt for AETC because it elected “replication” in its Pre-Election Certification Form and the technical parameters depicted in the proposed DTV TOA for the WCIQ-DT Channel *7 post-transition facility fall short of NTSC replication.

AETC released digital Channel *56 because it is an out-of-core channel and requested to revert back to Channel *7 for its post-transition digital channel and the FCC assigned it Channel *7 in the proposed DTV TOA. Referring to Exhibit 1, it can be seen that the proposed DTV TOA facility’s protected F(50,90) 36.0 dBuV/m noise limited contour for the WCIQ-DT facility (red contour) would more than replicate the licensed digital facility’s protected F(50,90) 42.4 dBuV/m noise limited contour (blue contour), but that is because AETC could not fund the authorized 1,000 kW out-of-core facility and had no choice but to build a lower-power digital out-of-core station. It can also be seen that the DTV TOA facility (red contour) would fall short of replicating its licensed analog F(50,50) 56.0 dBuV/m Grade B contour (black contour). The parameters assigned in the proposed DTV TOA for WCIQ-DT would result in an estimated minimum service population loss of 123,283 persons based on U.S. Census 2004 Estimation Data and this does not even take into consideration the additional losses of the population currently served outside the Grade B contour. This would be at least a 4.6% reduction to the population currently served by the licensed WCIQ-TV facility. The proposed DTV TOA also assigns the WCIQ-DT Channel *7 post-transition facility a directional azimuth pattern even though the licensed NTSC and DTV facilities are both nondirectional. This could force AETC

into purchasing a custom antenna to meet the FCC specified azimuth pattern relative field values instead of purchasing a much cheaper “off the shelf” non-directional antenna.

The FCC informed AETC that it calculates post-transition DTV operation based on the NTSC ERP for stations electing to go back to NTSC channels. Therefore, the core of all decisions acted upon by AETC with respect to the DTV transition, which includes the Pre-Election Certification application and the Channel Election application, were entirely based on the certainty that the WCIQ post-transition DTV facility would carry-over the Grade B coverage that it is currently licensed to serve to the public. Referring to Exhibit 2, it can be seen that the red F(50,90) 36.0 dBuV/m noise limited contour, representing the Final DTV TOA for the post-transition WCIQ-DT Channel *7 facility, would fully replicate the WCIQ-TV Channel *7 NTSC Grade B contour (black contour) with a maximum ERP of 21 kW using a nondirectional antenna. Therefore, AETC respectfully requests that the assigned ERP in the proposed DTV TOA be changed from 19 kW to 21 kW and the assigned antenna azimuth pattern be changed from directional to nondirectional so that it can serve the population now served with its licensed analog facility.

In conclusion, AETC requests that the ERP assigned to the WCIQ-DT Channel *7 post-transition facility in the proposed DTV TOA be changed to 21 kW and the assigned antenna azimuth pattern be changed from directional to nondirectional so that WCIQ will be able to serve the population its NTSC facility currently serves. The 19 kW ERP and directional antenna assigned to WCIQ in the proposed DTV TOA would result in hundreds of thousands of viewers losing service which would not be in the public’s best interest and could actually result in unfavorable reviews from the public with respect to digital television service.

Certification

This technical statement was prepared by William T. Godfrey, Jr., Telecommunications Technical Consultant with Kessler and Gehman Associates, Inc. having offices in Gainesville,

Florida and has been working in the field of radio and television broadcast consulting since 1998. He graduated from the University of North Florida with a Bachelor of Arts degree in Criminal Justice and a minor in Mathematics in 1993. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

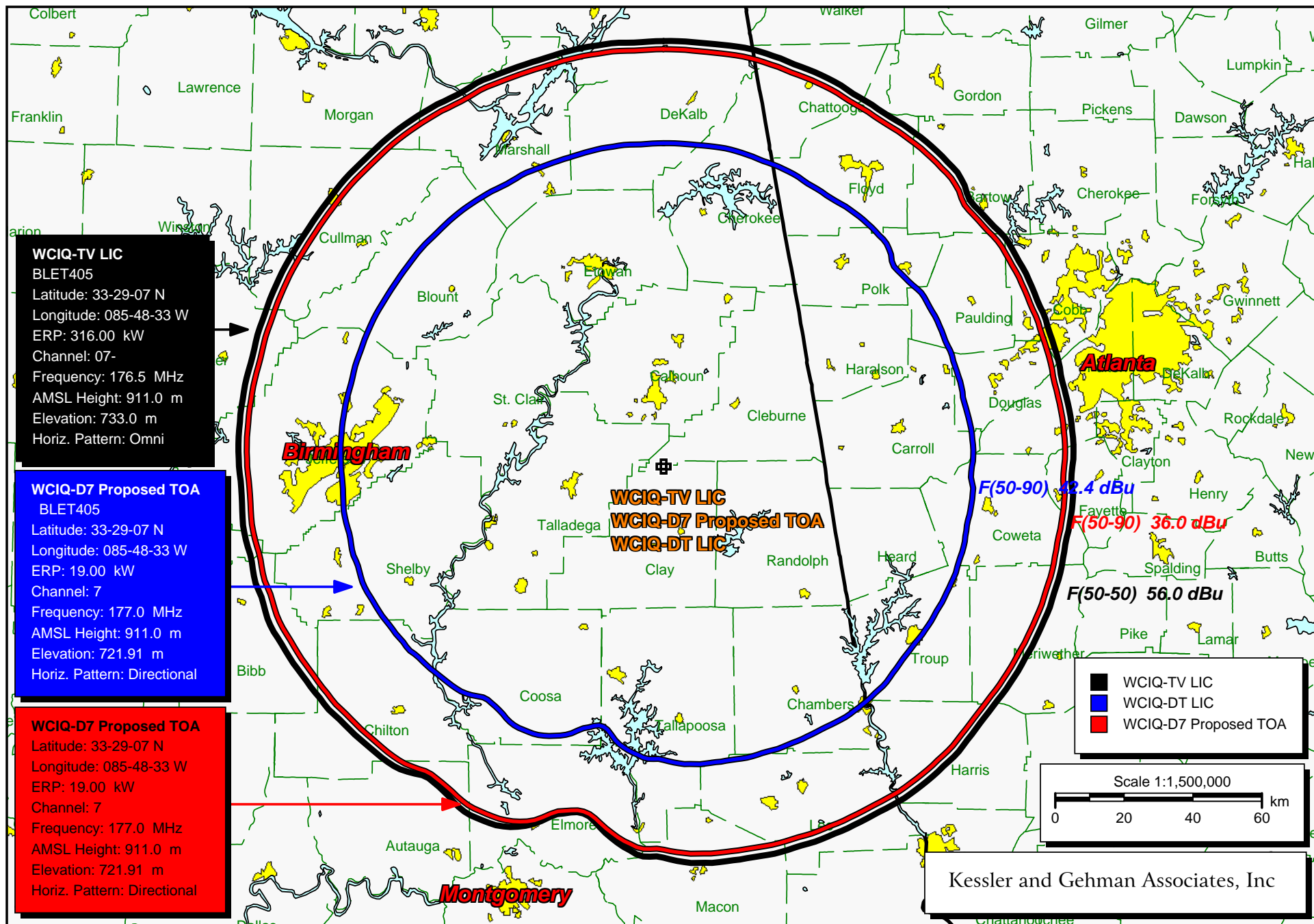


KESSLER AND GEHMAN ASSOCIATES, INC.

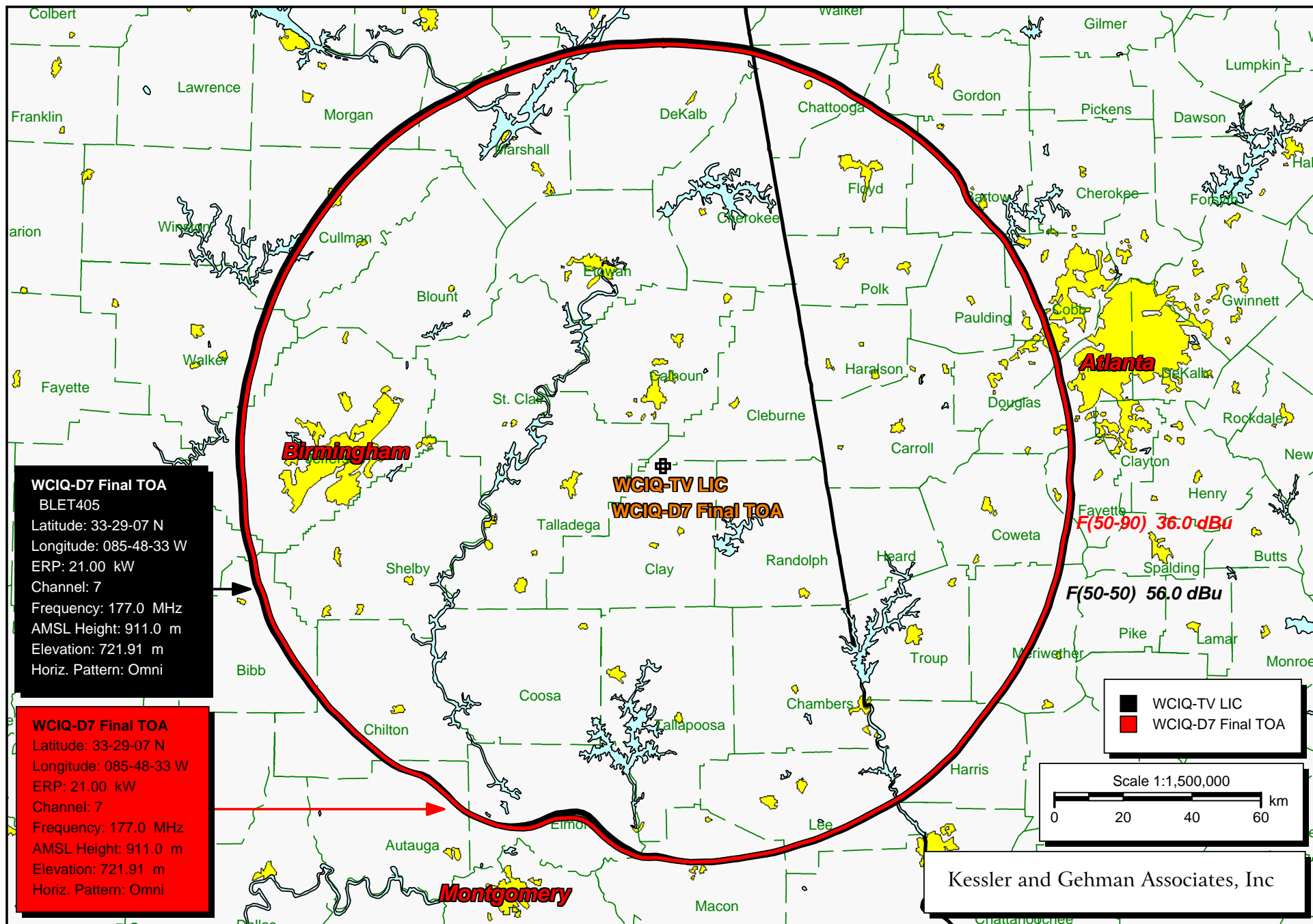
A handwritten signature in blue ink, reading "William T. Godfrey, Jr.", is written over a horizontal line. The signature is fluid and cursive.

WILLIAM T. GODFREY, JR.
Telecommunications Technical Consultant

15 January, 2007



WCIQ-DT Proposed DTV Table of Allotments Verification



WCIQ-DT replicates NTSC with an ERP of 21 kW and omni antenna

EXHIBIT 2